

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

IN RE WORLD TRADE CENTER  
LOWER MANHATTAN DISASTER  
SITE LITIGATION

---

21MC102(AKH)

HERMAN FRANCO,

08CV2621(AKH)

Plaintiff(s),

-against-

80 LAFAYETTE ASSOCIATES LLC, et al.,

Defendants.

---

**NOTICE OF ADOPTION BY  
BLUE MILLENNIUM  
REALTY LLC OF ANSWER  
TO MASTER COMPLAINT**

**PLEASE TAKE NOTICE** that defendant **BLUE MILLENNIUM REALTY LLC** (hereinafter “Blue Millennium”) as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts Blue Millennium’s Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). **BLUE MILLENNIUM** has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

**PLEASE TAKE FURTHER NOTICE THAT** defendant, Blue Millennium reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 (¶¶ D(1)-(5)).

**WHEREFORE**, Blue Millennium demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
April 26, 2008

**HARRIS BEACH PLLC**  
*Attorneys for Defendant*  
BLUE MILLENNIUM REALTY LLC

\_\_\_\_\_  
/s/  
Stanley Goos, Esq. (SG 7062)  
100 Wall Street, 23<sup>rd</sup> Floor  
New York, New York 10005  
(212) 687-0100

TO:

Paul Napoli, Esq.  
Worby Groner Edelman & Napoli Bern LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006

Robert A. Grochow, Esq.  
Robert A. Grochow, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

Gregory J. Cannata, Esq.  
Law Offices of Gregory J. Cannata  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
***Liaison Counsel for Plaintiff***

James E. Tyrrell, Esq.  
Joseph Hopkins, Esq.  
Patton Boggs LLP  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102  
***Liaison Counsel for the Defendants***

**All Counsel via ECF**

**CERTIFICATION AS TO SERVICE**

The undersigned certifies that on April 26, 2008, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Blue Millennium's Adoption of Answer to Master Complaint.

Dated: April 26, 2008

/s/  
Stanley Goos, Esq. (SG 7062)